

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

KELIE PALLADINO,
Plaintiff,

v.

CLIENT SERVICES, INC.,
Defendant.

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Case No.:

DEFENDANT CLIENT SERVICES, INC.’S NOTICE OF REMOVAL

Defendant Client Services, Inc. (“Defendant”) files this *Notice of Removal* of this action from the Court of Common Pleas of Pike County, Pennsylvania to the United States District Court for the Middle District of Pennsylvania as follows:

1. On September 22, 2021, Plaintiff Kelie Palladino (“Plaintiff”) commenced a civil action against Defendant in the Court of Common Pleases of Pike County, Pennsylvania.
2. This is a civil action based on Plaintiff’s contentions that Defendant has violated the Fair Debt Collection Practices Act, 15 U.S.C. § 1692 *et seq.* (the “FDCPA”).
3. Removal is proper because this case involves a federal question—alleged violations of the FDCPA. Therefore, the entire suit is removable under 28 U.S.C. §1441(a).
4. Removal is timely pursuant to 28 U.S.C. §1446(b) because Defendant has filed this Notice of Removal within 30 days of receipt of Plaintiff’s Complaint. Defendant was served with the Complaint on September 28, 2021.
5. Venue is proper in this district under 28 U.S.C. §1441(a) because the state court where the suit has been pending is located in this district.

6. Pursuant to 28 U.S.C. §1446(a), copies of all process, pleadings, orders and other papers filed in this action and obtained by Defendants are attached hereto and marked as composite **Exhibit A** and incorporated herein by reference.

7. A copy of this Notice of Removal has been sent to Plaintiffs and will be filed with the clerk of the Court of Common Pleases of Pike County, Pennsylvania.

8. A jury demand was made in state court.

For the above reasons, Defendant Client Services, Inc. requests that this Court assume full jurisdiction over the proceeding as provided by law.

Respectfully Submitted,

Date: October 27, 2021

METZ LEWIS BRODMAN MUST
O'KEEFE LLC

By: /s/ Justin M. Tuskan

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Attorneys for Defendant

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the forgoing Notice of Removal was served upon all counsel of record this 27th day of October, 2021 via Electronic Mail and/or the Court's Electronic Filing System.

METZ LEWIS BRODMAN MUST
O'KEEFE LLC

/s/ Justin M. Tuskan

Justin M. Tuskan